

**Before The
Federal Communications Commission**

Washington, D.C.

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Report on Broadcast)	MB Docket No. 04-233
Television and Notice of)	
Proposed Rulemaking)	
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To: The Commission

COMMENTS OF CHRISTIAN FAMILY NETWORK TELEVISION, INC.

Christian Family Network Television, Inc. ("CFNT") pursuant to section 1.419 of the Commission's Rules and Regulations, 47 CFR §1.419(2007) hereby submits these Comments in response to the above-captioned *Notice of Proposed Rulemaking*.

BRIEF BACKGROUND

1. CFNT is a non-profit corporation that operates two Class A television stations in Wichita Falls, Texas. We are governed by a Board of Directors, none of whom receives any compensation for board service from the stations. Our primary signal is seen in

Wichita Falls, although we are also carried on a couple of cable systems in nearby towns. Our programming consists of both religious and family-oriented fare, including E/I (children's programming), worship services from a variety of denominations and classic television programs. We also produce a number of local programs, including our public service oriented program "Good Neighbors," which highlights information of concern to residents of North Texas. Our broadcast schedule, along with other information concerning our stations, may be found at www.cfnt.org.

OUR UNDERSTANDING OF THE PROPOSED RULES

2. It is our understanding that the rules proposed by the Commission are designed to (1) improve communication and connection between stations and the communities they serve, (2) increase the amount of issue-responsive programming produced by stations as well as improve communications concerning natural and other disasters, and (3) increase service to audiences which are now under-served.

3. While several of the proposals for consideration by the Commission may help to achieve these ends others might actually cause undue hardship on small stations, like ours, that are sincerely trying to serve our communities of license despite limited resources. Although some full-powered stations appear to be giving less time to some aspects of their community service role, while still deriving significant financial benefits from ad and program sales, there are many Class A and LPTV stations that actually provide significant service to and are a powerful presence in their communities, especially in areas which are not considered profitable by their full-power counterparts.

3. The argument could be made that a station should not exist if it can not afford to implement these items, such as a constant physical presence at the station during hours of operation. But that argument may actually go against the real purpose of the proposals. Stations that exist to serve their communities, as opposed to contribute to the bottom line of multi-station corporations, do not always have the resources to have someone on site 24 hours a day, or constantly update their website with the

latest information from their public file, P&B, and other material. Many stations already expend a tremendous amount just to keep their Class A status, although that does not result in cable carriage for many of them. We are in the process of bringing our website up to standard and can assure you that it is not small or inexpensive task. Web development can run into the hundreds per hour.

COMMENTS ON ISSUES TO BE CONSIDERED

Change of Pre and Post Renewal Announcements

4. This proposal would and should work for any station, including ours.

Community Advisory Boards

5. *This is something that we've been considering for some time on our own.* It might not be the best plan, though, to implement the proposed idea of enlisting officials and other leaders in the community. We are considering those who are well respected in our community and who represent a variety of ethnic and economic communities of our populace.

6. As to whether a Community Advisory Board ("CAB") would adequately alert broadcasters to community issues and necessities

would largely depend on the station's willingness to demonstrate that they are open to suggestions regarding issue overage and that they will follow through on same. Concerning putting together a CAB, we would offer the following suggestions.

A. The station could begin by holding open meetings featuring station personnel in different locations in the community. Schools, churches and other locations that would allow for easy access for persons living in proximity to the meeting site could be used.

B. Those attending the meetings would be encouraged to share a brief biography and well as contact information with the station personnel. Announcements concerning the meeting should be aired on the station a couple of weeks prior to each meeting. From the information gathered at the meetings station personnel could begin making personal contact to determine those respondents who might actually be able to serve in some capacity.

C. Information provided by those interested should include recommendations/references which could assist the station in determining those who might offer the greatest impact in this endeavor. Again, because of the limited under which resources many of our stations operate the members of the CAB could provide their own resources to permit their participation.

D. The ideal make-up of such a board could include those in education, public service, local business, non-profit participants, the military and local government.

E. Logistics would help to determine how often the CAB could meet. The effectiveness of the CAB's involvement could be determined by the programming offered by the station as a result of this interaction with the CAB.

F. As to the use of the former categories of community leaders in the composition of the CAB this might, again, prove to be both labor intensive and cost prohibitive to small broadcasters, such as Class A licensees. Perhaps a list, with the qualifications of same, of those who have agreed to serve on the CAB, would suffice.

G. It is our belief that based on a station's size and income a "town meeting" could serve in lieu of a CAB. Other methods proposed, including opportunities for open phone or internet interaction with station personnel could serve, in many respects, to achieve the same purpose of determining the needs of the community.

Revision of Remote Operation Rules

7. While it is our desire to serve our community, we have no illusions that we are their first point of reference in the event of severe weather or national emergency. In these cases viewers will tune to those stations that have the resources to provide live radar, large news departments, etc. We do participate in the EAS system, but recognize the larger station's ability to provide more information due to their greater resources. The cost needed to maintain a person, or persons, at our specific station could be detrimental to our already taxed budget. We operate currently, even before we hope to go digital, on a very small budget. For us to

hire another person to work evenings and overnight is to add a full-time person to our staff at a potential cost of \$16,000 plus benefits a year. That cost might be a fourth or a fifth of our annual budget.

8. Current monitoring, both visually as well as electronically, would seem to suffice in this area, again, especially where the station, and its income, is limited. When there is a need stations without the full resources of their large broadcast counterparts could be electronically contacted by the authorities, including by cell phones, to instruct them to sign off their transmission within a reasonable time. This proposal really addresses the fundamental difference between full power and low power television stations.

9. Would it be possible for the Commission to consider making certain regulations applicable based on a station's, or a group of stations, annual income? As one example, sections 79.1(d)(11) and (12) of the Commission's Rules provide exemptions from closed captioning requirements based on a station's annual revenues or the percentage of revenue which the cost of closed captioning exceeds. In this instance, we would suggest that some

stations be exempt from rules, such as the proposed rule to require constant remote monitoring, if the station's revenues do not exceed \$500,000. While this figure is far below the cut-off amount for exclusion from the closed captioning requirements, it is still a reasonable amount.

10. The digital transition is a good example of this concern. It is common knowledge that many converter boxes being offered to the public at this time do not pass the analog signals which will continue to be made available to the public through LPTV stations after February, 2009. The financial commitments necessary to make the digital transition are tremendous. Yet LPTV and Class A stations around the country are doing their best to put the resources together to continue to serve their communities despite the seemingly overwhelming odds.

Requiring a Certain Amount of Local Programming

11. Although CFNT's stations have consistently broadcast more than the three hours of local programming a week, and it supports the imposition of some standards regulating the amount of acceptable licensee service through local programming, requiring

much more than the three hours a week of local programming already required of Class A stations could be financially injurious to smaller “mom and pop” stations.

12. CFNT provides a significant amount of local programming, some of which is unique in our television market, through several different means. **To our knowledge CFNT produces and airs the only locally produced Spanish language programming in our market.** Our little stations, not the affiliates associated with CBS, NBC, ABC, or Fox, shoot and edit a weekly half-hour program in Spanish. We are compensated a minimal amount for this production. The revenue for this half-hour program is less than some 30 second spots sell for in our market.

13. By the same token, we have our station’s weekly half hour program, for which we underwrite the cost, Good Neighbors. Since the first of the year this program has dealt with topics that are important to our community, including: Autism, adult literacy; teen issues(with a program on the “Straight Street” work in Wichita Falls); our local homeless shelter; our city Mass Transportation program, the WFISD program and more. We have

been complemented by guests on the program, by our guests on the program for giving them a half hour to explore their topics as opposed to the minute or two they would receive on a full power station's newscast. The program airs, by the way, at 6:00 p.m., prime-time in the Central Time Zone. The local cable system also picks up this program and airs it on their public access channel as a means of reaching out to the community.

13. In addition, **our station produces and airs the only programming produced in our market that is hosted by an African American and which is designed to appeal to our African American community.** This program is a source of information on a variety of issues. Last summer, when floods literally destroyed a great part of the housing occupied by lower income families, we were host to leaders in the African-American community as well as county government as we provided much needed information regarding resources for people who had lost a great deal.

14. We also provide an outlet for local programming provided by persons of various churches in our market, including Assemblies of God, Baptist and Non-Denominational congregations. We also

produce Public Service Announcements for non-profit organizations in our area. The point is—we produce and assist others in producing, programming that is unique to our market because this attitude is the thing that separates us and provides an identity for our station in relation to our viewers.

Regarding Requiring Main Studios to be Located in the City License

15. This is a great idea. Locating the main studio in the community of license will keep the station with closer local ties as they serve their community, and provides for greater access to production facilities in the are of service.

On Increasing Political Broadcasting, Especially Local Political Broadcasting

16. It is our position that we have put effort, time and expense into a station which will serve our community and provide the values which we believe encourage and uplift our viewers. While we understand the requirements regarding Federal offices, we hope that the regulations will not be extended to require that local office holders be given equivalent political rights, as this would further erode our First Amendment Rights.

Network Affiliation Agreements

17. We strongly support a station's right to reject certain programming which would not resonate with their audience. We would also support a station's right to be able to preview programming prior to airing it where a question might exist regarding its acceptability to the station's audience.

Conclusion

18. In closing we thank you for considering our primary thesis. We respectfully request that the Commission consider making certain rules and regulations, particularly those concerning remote operation, applicable based on station income in the same fashion that current regulations pertaining to closed captioning are assessed. Obviously, technical requirements regarding transmission power, frequency interference, etc., must apply to all licensees. However, there are some proposals in this Rulemaking,

particularly the proposed changes in the remote operation rules,
which will hamper small stations in their ability to serve their
communities.

Respectfully Submitted,

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TELEVISION, INC.**

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